

**pp-[I-IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TENNESSEE**

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AUTO-OWNERS (MUTUAL) INSURANCE )  
COMPANY, )  
  )  
Plaintiff / Counter-Defendant, )  
  )  
  )  
v. )                                      **No. 2:21-cv-02082**  
  )  
  **District Judge Lipman**  
**BEN REARDON,** )                                      )  
  )  
Defendant / Counter-Plaintiff. )

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**DEFENDANT/COUNTER-PLAINTIFF'S MOTION TO COMPEL**

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COMES NOW the Defendant/Counter-Plaintiff, Ben Reardon (“Mr. Reardon”), by and through counsel, pursuant to Federal Rules of Civil Procedure 26, 34, and 37, and respectfully moves this Court for entry of an Order compelling the Plaintiff/Counter-Defendant, Auto-Owners (Mutual) Insurance Company, to provide full and complete responses to Defendant/Counter-Plaintiff’s First Set of Interrogatories and Requests for Production of Documents to Counter-Defendant, and specifically, to produce certain documents withheld in its Privilege Log. In support of this Motion, Mr. Reardon relies on the Memorandum in Support of Motion to Compel, filed contemporaneously herewith, which fully details the requested documents.

For the foregoing reasons, Mr. Reardon respectfully requests that this Court enter an Order granting its Motion to Compel. A proposed “Order Granting Motion to Compel” has been submitted electronically to chambers, per the Local Rules of the United States District Court for the Western District of Tennessee.

Respectfully submitted,

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*Attorneys for Defendant / Counter-Plaintiff*

**CERTIFICATE OF SERVICE**

I, the undersigned, do hereby certify that a true and exact copy of the foregoing **DEFENDANT/COUNTER-PLAINTIFF'S MOTION TO COMPEL** has been mailed electronically via the Court's Electronic Filing System to the following on this the 26<sup>th</sup> day of May 2021:

Benjamin E. Goldammer  
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s/ Jonathan L. Bobbitt